

September 9, 1998

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical and it is presented here exactly as submitted.



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August 21, 1997

RECEIVED

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OPP PUBLIC DOCKET

Ms. Jill Bloom
Reregistration Branch II
Special Review and Reregistration Division [7508W]
Office of Pesticide Programs
U.S. Environmental Protection Agency
Crystal Mall, Bldg. #2, Rm. 266A
1921 Jefferson Davis Highway
Arlington, VA 22202

RE: Phorate Reregistration - Request for "Monte Carlo" acute dietary risk assessment;
EPA Letter Dated August 14, 1997.

Dear Ms. Bloom:

On August 19, 1997, American Cyanamid Company (ACCo) received a written request from EPA for submission of a Tier III ("Monte Carlo") acute dietary risk assessment for phorate. The Agency letter requested the analysis be submitted by August 27, 1997.

ACCo, as well as many other registrants, does not have the computer software necessary to complete such an assessment; and, therefore, we must rely on outside consultants to perform Monte Carlo evaluations for us. Currently we are under contract with Novigen Sciences, Inc. to perform such work. When questioned as to scheduling a Monte Carlo evaluation for phorate, Novigen replied that their work load allows for delivery of an assessment to Cyanamid by October 15, 1997.

Taking into consideration the FQPA-driven rush to conduct acute dietary risk evaluations for OP/carbamate tolerance reassessments and the delays such a rush can conceivably cause in Novigen's scheduling, we believe we can provide the Agency with the Monte Carlo assessment for phorate on or about November 15, 1997.

I can be reached at telephone number 609-716-2378, facsimile number 609-716-2333, or by e-mail at wrubelj@pt.cyanamid.com.

Sincerely,

John J. Wrubel
Product Registrations Manager
U.S. Plant Regulatory Affairs

1